

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

DONALD J. TRUMP FOR PRESIDENT, INC.; et al.,) CIVIL ACTION
)
)
Plaintiffs,)
)
v.) No. 2:20-CV-966
)
KATHY BOOCKVAR; et al.,)
)
Defendants.) JUDGE NICHOLAS RANJAN

STIPULATION

Plaintiffs and the undersigned County Election Boards, by their undersigned counsel, hereby stipulate as follows:

1. The undersigned County Election Boards desire a prompt resolution of this case in order to have direction on how to properly proceed in the upcoming November 2020 General Election. Accordingly, while the undersigned County Election Boards neither admit nor deny the allegations of the Verified Amended Complaint, the undersigned County Election Boards do not object to, and stipulate and agree to not contest, the declaratory and injunctive relief requested by Plaintiffs in this action. Also, the undersigned County Election Boards stipulate and agree to abide by whatever decisions the Court in this action and/or the General Assembly make regarding the upcoming General Election.

2. To the extent reasonably possible and in the absence of agreed upon extension by Plaintiffs, the undersigned County Election Boards stipulate and agree that they shall, by August 13, 2020, answer and respond fully and completely, subject to only objections concerning privilege, the written interrogatories and document requests served upon them by Plaintiffs on July 24, 2020, and produce to Plaintiffs' counsel all requested non-privileged items and documents.

3. In exchange for the undersigned County Election Boards' stipulation and cooperation in discovery as stated in the other paragraphs of this Stipulation, Plaintiffs stipulate and agree to forego any claim for attorneys' fees and costs against only the undersigned County Election Boards and agree not to enter default or seek any further response from the undersigned County Election Boards in this case.

4. To the extent the deposition testimony or other sworn statement of the undersigned County Election Boards shall be reasonably necessary for evidentiary purposes, Plaintiffs and the undersigned County Election Boards stipulate and agree to reasonably cooperate with each other to provide such testimony or statement in the least burdensome manner.

Respectfully submitted,

PORTER WRIGHT MORRIS & ARTHUR LLP

Dated: August 7, 2020

By: /s/ Ronald L. Hicks, Jr.

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Counsel for Plaintiffs

BUTLER COUNTY
BOARD OF ELECTIONS

Dated: August 7, 2020

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CAMBRIA COUNTY
BOARD OF ELECTIONS

Dated: August 7, 2020

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SOMERSET COUNTY
BOARD OF ELECTIONS

Dated: August 7, 2020

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